

UNITED STATES DISTRICT COURT

Eastern District of Tennessee

Greeneville Division

Kelsie C. Meeks*Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-**SEE ATTACHED***Defendant(s)*

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 2:22-CV-118*(to be filled in by the Clerk's Office)*Jury Trial: *(check one)* ☒ Yes ☐ No**COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name KELSIE C. MEEKSStreet Address 505 PAUL STCity and County GREENEVILLE, GREENE COUNTYState and Zip Code TENNESSEE 37743Telephone Number 423-440-4475E-mail Address meeks.kc@outlook.com**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	RAYMOND V. JOHNSON
Job or Title <i>(if known)</i>	DRIVER-OPERATOR
Street Address	527 W FORT HILL ST
City and County	LOUDON, LOUDON COUNTY
State and Zip Code	TENNESSEE, 37774
Telephone Number	UNKNOWN
E-mail Address <i>(if known)</i>	UNKNOWN

Defendant No. 2

Name	AMERICAN WHOLESALE BOOK COMPANY INC.
Job or Title <i>(if known)</i>	COMMERCIAL CARRIER
Street Address	4350 BRYSON BLVD
City and County	FLORENCE, LAUDERDALE COUNTY
State and Zip Code	ALABAMA, 35630
Telephone Number	256-718-8356
E-mail Address <i>(if known)</i>	UNKNOWN

Defendant No. 3

Name	BOOKS-A-MILLION INC
Job or Title <i>(if known)</i>	UNKNOWN
Street Address	402 INDUSTRIAL LN
City and County	BIRMINGHAM, JEFFERSON COUNTY
State and Zip Code	ALABAMA, 35211
Telephone Number	865-691-2665
E-mail Address <i>(if known)</i>	UNKNOWN

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* KELSIE C. MEEKS, is a citizen of the State of *(name)* TENNESSEE.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* RAYMOND V. JOHNSON, is a citizen of the State of *(name)* TENNESSEE. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) SEE ATTACHED, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

AMOUNT IN CONTROVERSY IS APPROXIMATELY \$1 MILLION FOR LOSSES OF WAGES, PERSONAL INJURIES, AND PERMANENT INJURIES TO THE BODY AS A WHOLE.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On September 29, 2021 the plaintiff was traveling North on 11E in a 2021 Nissan Sentra In Greeneville, Greene County. Approaching a green light was struck on the front passenger side by the driver, Raymond V. Johnson driving an 18 wheeler transfer truck, Which was approaching the defendant on the plaintiffs right side, exiting the 81 I 81 N. off ramp, and running the red light, striking the defendant, and totaling her car, and causing the plaintive serious and disabling injuries.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The plaintiff, Kelsie Meeks, was injured by the defendants, in the following manner; her arm was broken in three places, her elbow badly injured, a concussion, it sliced her right hand open in two places, reinjured her left hand that was broken, caused lacerations on her chest, busted her lip, chipped one tooth, broke off a front tooth, and cracked four surrounding front teeth. plaintiffs left hand, elbow, fingers and arm, are permanently damage. The plaintiff can not further her career of choice due to risking her arm of becoming permantly imobilized. A risk that she now permanetly will fear. She was approved

by orthopedic surgeon to return to work 8 months after accident, with only a maximum 5-10 pound lifting restriction. Plaintiffs present and future medicals, pain and suffering, and disabilities are estimated in the \$1 million dollar range.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff _____

Printed Name of Plaintiff _____

B. For Attorneys

Date of signing: September 28, 2021

Signature of Attorney s/ William H. Bell

Printed Name of Attorney William H. Bell

Bar Number 006363

Name of Law Firm William H. Bell Attorney at Law

Street Address 102 W. Mckee St

State and Zip Code Tennessee, 37743

Telephone Number 423-639-7730

E-mail Address whbell944@gmail.com